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January 16, 2024

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 1/19/2024

Re: United States v. Sajid Javed
Docket No.: 16-CR-601 (VSB)

Dear Judge Broderick:

Defense counsel and the Government respectfully submits this joint letter seeking a 45-day adjournment of the deadline by which to submit a proposed discovery schedule, in light of the parties' ongoing negotiations about a potential settlement of this ancillary forfeiture proceeding.

As the Court is aware, this matter now encompasses two properties to which the defendant, Sajid Javed, may possess a forfeitable interest in. Over the course of the past several months, the parties have engaged in meaningful conversation in an effort to obtain an amicable resolution of this matter.

In an effort to ascertain the interests of the defendant, if any, in the two properties, counsel for defendant is in the process of amassing various financial records which may be utilized in reaching a final resolution of this matter. It is envisioned that the within sought records should be obtained within the next 45 days.

By reason of the foregoing, the parties jointly and respectfully request a 45-day adjournment of the deadline by which to submit a proposed discovery schedule to give the parties additional time to continue their efforts to resolve this ancillary forfeiture proceeding without further litigation.

Respectfully Submitted,



Lawrence V. Carra

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